

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC,
SPRINT/UNITED MANAGEMENT
COMPANY,
T-MOBILE USA, INC., and
CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS,

Defendants.

Civil Action No. 5:19-cv-75

JURY TRIAL DEMANDED

**THIRD JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT AGREED
PROTECTIVE ORDER**

Plaintiff Joe Andrew Salazar (“Salazar”) and Defendants AT&T Mobility LLC, Sprint/United Management Company, T-Mobile USA, Inc., and Cellco Partnership d/b/a Verizon Wireless (“Defendants”) (collectively, the “Parties”) file this Joint Motion for Extension of Time to Submit Agreed Protective Order. As good cause supporting this Motion, the Parties respectfully show as follows:

1. Pursuant to the Court’s Order (Dkt. 34), the initial deadline for the parties to submit a proposed agreed protective order was October 31, 2019. The Parties moved for an extension of that deadline to November 7, 2019, which the Court granted (Dkt. 44). The Parties moved for a second extension of that deadline to November 14, 2019, which the Court also granted (Dkt. 46).

2. Salazar and Defendants jointly move the Court for an order granting an additional five (5) day extension of time for the parties to submit their agreed proposed protective order, up to and including November 19, 2019. Grant of this extension will not unduly delay the orderly and expeditious preparation of this action for trial and such request is not sought solely for the purposes of delay but only so that justice may be done.

3. Good cause is demonstrated for the grant of this requested extension because the parties are continuing to narrow disputed issues. Granting this extension may reduce the number of disputed issues the Parties will need to submit to the Court. The Parties also do not anticipate that granting this extension will require re-setting the scheduling conference scheduled for November 21, 2019.

4. A proposed order granting the relief requested in this motion is attached for the Court's review.

WHEREFORE, the Parties jointly request the Court to extend the Parties' deadline to submit a proposed agreed protective order up to and including November 19, 2019, and for such other relief as the Court deems suitable and just.

Dated: November 14, 2019

Respectfully submitted,

/s/ Geoffrey Culbertson

Geoffrey Culbertson

TX Bar No. 24045732

gpc@texarkanalaw.com

Kelley Tidwell

TX Bar No. 20020580

kbt@texarkanalaw.com

PATTON, TIDWELL & CULBERTSON, LLP

2800 Texas Boulevard

Texarkana, Texas 75503

Telephone: 903-792-7080

Fax: 903-792-8233

Daruish Keyhani (Lead Attorney)

District of Columbia Bar No. 1031500

(pro hac vice)

Frances H. Stephenson

New York registration No. 5206495

(pro hac vice)

Keyhani LLC

1050 30th Street NW

Washington, DC 20007

Telephone: (202) 748-8950

Fax: (202) 318-8958

dkeyhani@keyhanillc.com

fstephenson@keyhanillc.com

Attorneys for Plaintiff

/s/ Fred I. Williams

Fred I. Williams
Texas Bar No. 00794855
fwilliams@velaw.com
VINSON & ELKINS LLP
2801 Via Fortuna, Suite 100
Austin, Texas 78701
Tel: 512.542.8400
Fax: 512.542.8610

Todd E. Landis
Texas Bar No. 24030226
tlandis@velaw.com
VINSON & ELKINS LLP
2001 Ross Avenue, Suite 3700
Dallas, TX 75201
Tel: 214.220.7700
Fax: 214.220.7716

Parker Hancock
Texas Bar No. 24108256
phancock@velaw.com
VINSON & ELKINS LLP
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Tel: 713.758.2222
Fax: 713.758.2346

Harry Lee Gillam, Jr.
State Bar No. 07921800
gil@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Tel: 903.934.8450
Fax: 903.934.9257

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 14th day of November, 2019, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Fred I. Williams